

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

PIONEER SERVICES, INC.,)	
)	
PLAINTIFF,)	
)	
V.)	2:06cv377-WKW
)	
AUTO-OWNERS INSURANCE COMPANY,)	
INC., et al,)	
)	
DEFENDANTS.)	

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on May 16, 2006 via telephone and was attended by:

- a. Harry P. Hall, II, Attorney for Plaintiff; and
- b. Joel H. Pearson, Attorney for Defendant Auto-Owners Insurance Company.

2. **Pre-Discovery Disclosures.** The parties will exchange the information required by Rule 26 (a)(1) by May 31, 2006.

3. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

- a. Discovery will be sought on the following subjects; all allegations in Plaintiff's Complaint and all allegations pled in Defendants' Answer.
- b. All discovery will be commenced in time to be completed by December 15, 2006 with the exception of the deposition of Defendant's retained experts under paragraph (e) below;
- c. Maximum of 30 Interrogatories allowed by each party to each other party. Maximum of 30 Requests for Production of Documents allowed by each party to each other party. Maximum of 20 requests for Admissions allowed by each

party to each other party. Responses are due thirty (30) days from the date of the requests.

- d. Maximum of ten (10) depositions by each party and limited to a maximum of four (4) hours for non-parties and eight (8) hours for parties; These limitations can be extended by the court on motion of any party for good cause shown or by agreement of the parties.
- e. Reports from retained experts under Rule 26(a)(2) due:
 - i. From Plaintiff by November 15, 2006; Plaintiff's experts to be available for deposition by November 30, 2006.
 - ii. From Defendants by December 15, 2006; and Defendant's experts to be available for deposition by January 10, 2007.
- f. Supplementation under Rule 26(e) as provided by the Federal Rules of Civil Procedure shall take place as soon as possible and in no event later than January 31, 2007.

4. Other Items.

- a. A scheduling conference will be set by the Court, if it so chooses.
- b. The parties request the court set the deadline for amending pleadings as September 29, 2006.
- c. All potentially dispositive Motions should be filed by December 31, 2006;
- d. Settlement is being evaluated; The parties agree to mediate this case prior to January 1, 2007.
- e. The parties request a final pretrial conference in the first week of March, 2007.
- f. Final lists of trial evidence, witness lists and deposition designations under Rule 26(a)(3) shall be filed and served as

follows: by Plaintiff on or before February 15, 2007 and by Defendants on or before February 21, 2007. The parties will be allowed two weeks to complete depositions of any previously undisclosed witnesses whose identity is disclosed pursuant to this paragraph. The parties shall have 10 days after service of final lists of witnesses and exhibits to file objections under Rule 26(a) Federal Rules of Civil Procedure.

- g. The Plaintiff believes this case should be ready for trial by March 2007. The Defendant requests the court set the case for trial in its July 2007 jury term as Counsel for Defendant has two other cases scheduled for trial in March of 2007. Trial is currently expected to take approximately three days.

Respectfully submitted this the ____ day of May, 2006.

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